

GENNARO CARIGLIO JR., P.L.

8101 BISCAYNE BOULEVARD • PENTHOUSE 701 • MIAMI, FL 33138

TEL (305) 899-0438

FAX (305) 373-3832

August 26, 2020

Hon. Valerie E. Caproni
United States District Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square, Courtroom 443
New York, N.Y. 10007

Re: *U.S. v. Vincent Schifano*, 18-cr-262 (VEC)

Your Honor:

The defense moves this Court for permission to redact portions of Mr. Schifano's Motion for Compassionate Release on the public docket and seal the original motion. Specifically, the defense is requesting to redact the portions of the motion that relate to Mr. Schifano's medical history, a part of Exhibit A which mentions his medical history and release address and to redact Exhibit B, which are Mr. Schifano's medical records.

Counsel has spoken with counsel for the government, AUSA Matthew Laroche, who advised that the government has no objection to filing the portions of the motion that relate to Mr. Schifano's medical history under seal and to counsel redacting references to Mr. Schifano's medical history in the publicly filed version.

Sincerely yours,

s/Gennaro Cariglio
Gennaro Cariglio Jr., Esq.
Atty. for Vincent Schifano